

From: Mitchel B. Turbin PhD
To: FCC Television Caption Quality NPRM
Re: TV Captioning – pervasively of poor quality!
Date: October 31, 2005

I am pleased to submit information to the Federal Communications Commission regarding Proposed Rules on TV Captioning Quality. I am a professional in the field of rehabilitation and research, currently employed as a Research Investigator at the VA National Center for Rehabilitative Auditory Research in Portland Oregon. My most recent previous position was at Independent Living Resources in Portland where I was Coordinator of Services to People with Hearing Loss. I have published and given workshops about issues of concern to and about individuals with hearing loss across the US and overseas, to consumers, professionals and undergraduate and graduate university students. I was a consumer representative at the first Caption Quality Initiative Conference in Washington DC in 1992 and I have served as a member on a number of US Department of Education Peer Review Panels, including several in the area of media access. I have also been a consultant to LNS Captioning & Court Reporting in Portland. I myself have a progressive hearing loss, wearing a hearing aid in my left ear and a Cochlear Implant in my right, and live with my partner Jo Ann Ulrich, who wears two hearing aids and also has a progressive hearing loss, currently in the severe range, bilaterally. She requires captioning on all TV programming; I prefer it, although I am no longer dependent on captions since the very successful implantation of the CI. Our joint experience of much TV captioning, both real-time, teleprompter, and pre-recorded, is that it is often of such poor quality that it is an impediment to communication, rather than an aid.

Yesterday evening (Sunday 10/30) provided several pertinent examples of our experience of captioning, with a typically varied set of successes and failures. At 6pm we watched the national news on NBC. It was captioned quite well for the first half of the show, and then the captions disappeared for the entire second half. Surfing other channels verified that there was nothing wrong with our TV or cable. At 6:30 we watched the local news on that

same local NBC affiliate, which is our only station using real-time captioning in that time slot. No problem broadcasting the captions here BUT the captioning was so poor it was entirely ludicrous to watch. Since I can hear newscasts quite well, I could easily perceive that there was rarely (if ever) an entire spoken sentence that was accurately displayed. Rather, what was broadcast on the bottom of the screen was a flow of gibberish, half sentences joined together with the word "and". Unbelievable! It was as if the paragraph above was captioned as "Pleased to present and a professional in the field and several in the area of media access and my partner wears two hearing aids. Requires TV captioning and prefer it and very successful implantation and real-time and pre-recorded often such quality that is rather than an aid." I kid you not, and I do not exaggerate.

After that program we watched, as so many in our generation do, "60 Minutes." I am pleased to say that the captioning on that show has improved recently. Not that this captioning (of course pre-recorded) is in any way as inaccurate as the above. No—captions on 60 Minutes do tend to accurately display the content of the spoken word of the show. But the timing! Timing of the captions is now perhaps 3 to 4 seconds behind the sound, which is a great improvement over the probably 5 to 10 seconds behind that has been the norm for this program for years. There is no good reason for this—it is not a difficult process for professionals in the field to synchronize pre-recorded broadcast material with its captions. 60 Minutes, of course, has been around a long long time, and does so much else very well. Which is why we always watch it, but often with that extra unnecessary edge of annoyance elicited by the badly synchronized captions.

Following 60 Minutes we went looking for a movie (alas, Psycho [1998 version] turned out to be on a subscription channel we don't want to pay for). Another good scary film was presented on The Movie Channel—but it turned out to be non-captioned. So we went to our cable company's "On Demand" section and found what turned out to be an excellent choice ("The Shape of Things"—very quirky yet thought provoking). Voila! Captioning can be done right, and when it is, as in the presentation of this film, it is a delightful

tool for communication access. Accurate, synchronized to the sound, and uncensored. Done by professionals in a thoroughly professional manner.

I urge the FCC to establish rules mandating captions of high quality. I concede that when Real-Time Captions are required, there will be some time lag, and some inaccuracy. However, I regularly watch TV and meetings that are captioned by the employees of our local company, LNS, and see that good quality Real-Time captions can be reliably rendered by good quality professionals.

The most important solution to this problem that I want to offer is the need for INDEPENDENT evaluations of captioning quality, preferably done via random sampling when neither the broadcast company nor the captioning company are aware of the evaluation. The requirement for independent evaluations has been sadly dropped from the last several rounds of Department of Education competitions I participated in. Rather, programs have been allowed to evaluate their own quality, and this is illogical and probably illusory. It certainly has not worked for TV captioning. I suggest that FCC establish a separate Unit for evaluating TV Caption Quality. A panel of captioners and broadcasters and consumers should be constituted to generate a reasonable set of minimum quality standards for TV captions. Standards must contain specific quantifiable requirements for accuracy of captions and degree of synchronization to sound. I do not think 95% accuracy, with no more than 2 seconds lag time for Real-Time captions, and NO lag time for pre-recorded programming, are unrealistic or unfair. The FCC Caption Quality Unity should systematically sample captioning across the nation. Stations or programs that fail to meet established standards should receive warning citations. Upon re-evaluation (approximately 1 month after offense) standards should be met or stiff financial penalties should be assessed. I suggest this system be employed for a 2 year period. It's results can then be themselves evaluated and a determination made as to whether the system works, should be extended, amended, or replaced. Indeed, if after 5 years the industry achieves good national compliance, that Unit might be

eliminated, replaced by an industry evaluation body.

A final observational note: on New Years Day 2003, Portland suffered an unexpected snow blizzard, which was followed by warm days and freezing nights. The resultant ice paralyzed the city. I had fortunately brought work home and was able to constructively spend my days there. Most of the time I wasn't doing work, however, I was watching the local ABC TV affiliate. They presented two superb weatherpeople at all hours, and for more than three days I saw lots of excellent, accurate Real-Time captioned Emergency TV news. IT CAN BE DONE, AND IT MUST BE!

Thank you for your attention to this important issue of great significance to a large and growing segment of our population. Please do not hesitate to contact me if you feel I might be of some further assistance to you in understanding and addressing these service gaps.

Sincerely,

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